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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

BOAZ PLEASANT-BEY,)	
)	
Plaintiff,)	
)	Case No. 3:19-cv-00486
VS.)	JUDGE TRAUGER
)	JURY DEMAND
STATE OF TENNESSEE, et al,)	
)	
Defendants.)	
	X	

DEPOSITION OF DANIEL KNIGHT
TAKEN ON NOVEMBER 17, 2021

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S T I P U L A T I O N

The deposition of Daniel Knight, taken on behalf of the plaintiff, remotely via Zoom, by agreement of parties, on November 17, 2021, for all purposes allowed under the Federal Rules of Civil Procedure.

It is agreed that Carole K. Briggs, licensed court reporter for the State of Tennessee, may swear the witness, take his deposition, and afterwards reduce same to typewritten form, and that the reading and signing of the completed deposition by the witness is not waived.

(Unless name spellings are provided, all names are spelled phonetically to the best of the court reporter's ability.)

1 (Whereupon, the foregoing deposition
2 began at 1:07 a.m.)

3 THE COURT REPORTER: We are on the record.
4 Today is November 17, 2021, at 1:07 p.m. At this time,
5 would each attorney please introduce yourself, who you
6 represent and that you agree to take this deposition by
7 Zoom. And we'll start with Mr. Jacobs.

8 MR. JACOBS: Good afternoon. I'm Mr. Matthew
9 Jacobs. I am representing Mr. Pleasant-Bey in this
10 matter. And I have agreed to take this via Zoom.

11 MS. POLLY: Erin Palmer Polly. I represent
12 the CoreCivic defendants. And I agree to take this
13 deposition by Zoom and am fine with it being recorded.

14 GENERAL: Good morning. I am Senior
15 Assistant Attorney General, Eric Fuller. I represent
16 the TDOC defendants here. And I also have no
17 objections.

18 Whereupon,

19 DANIEL KNIGHT,
20 having been first duly sworn, was examined and deposed
21 as follows:

22 EXAMINATION BY MR. JACOBS:

23 Q. All right. Good afternoon. Could you
24 please, sir, state your full name for the record.

25 A. My name is Daniel Knight. Gordon is my

1 middle name. I'm sorry. Daniel Gordon Knight.

2 Q. Do you understand why you are here doing this
3 Zoom meeting?

4 A. Yes, sir.

5 Q. And why are you here with us today?

6 A. To testify on behalf of the company and the
7 happenings at the facility.

8 Q. All right. I'm going to share something with
9 the group here.

10 MR. JACOBS: We're going to start with this
11 and enter it as Exhibit 1.

12 (Exhibit 1 was marked.)

13 MR. JACOBS: Does everybody see that in the
14 chat?

15 THE WITNESS: I just have the attachment, I
16 have to, I guess --

17 MR. JACOBS: Well, I'm going to screen share.
18 I just want to make sure that it was in the chat.

19 THE WITNESS: Okay. Yeah.

20 MR. JACOBS: Ms. Briggs, I think it says that
21 I'm disabled from screen sharing?

22 (Off the record discussion.)

23 BY MR. JACOBS:

24 Q. Mr. Knight, do you see underneath Exhibit 1,
25 going to Page 2, do you see where it says notice of

1 deposition of Daniel Knight?

2 A. Yes, I do.

3 Q. Have you seen this document before?

4 A. I don't think so.

5 Q. You have not?

6 A. If I have, it was sent to me when we first
7 started the phone calls. I don't remember if I have it
8 or if it was up front with the warden's secretary and
9 the warden. I knew that I was taking part in this, I
10 just didn't know -- I am not sure if I actually received
11 this to my e-mail or if it was filed up front with the
12 warden's secretary.

13 Q. Do you see where it says, you are hereby
14 notified that on the 17th day of November, 2021,
15 beginning at 1:00 p.m., by way of Zoom --

16 A. Yes.

17 Q. -- counsel for plaintiff will proceed to take
18 your deposition?

19 A. Yes, I do.

20 Q. Do you understand that that is the deposition
21 that you are a part of at this moment?

22 A. Yes, sir.

23 Q. Have you ever taken a deposition before prior
24 to this?

25 A. I believe so. That was a deposition, right,

1 Ms. Polly? I was with the other case. It was a grand
2 jury deposition, I believe.

3 Q. You said with another case. Do you remember
4 the name of that case?

5 A. I don't remember the name. I know the person
6 involved. I don't know what it was. Officer Lister, at
7 the time.

8 Q. Do you remember if that was a civil or
9 criminal matter?

10 A. I don't. I don't know what it was filed as.

11 Q. Do you remember if that involved CoreCivic?

12 A. I don't think so. I mean, I was there, but I
13 don't know what the terms of the deposition was or what
14 they were indicting on.

15 Q. And you said you didn't remember what it was
16 about?

17 A. It was to do with an officer and a use of
18 force, I believe.

19 Q. An officer that used force. Okay, do you
20 remember why you were called to be involved in that?

21 A. Yeah, I had had a conversation, I believe,
22 with him. And I do training here at the facility, so
23 they spoke with me about some of the training that comes
24 through and different procedures that we go through
25 here, what is taught in the training and things of that

1 nature.

2 Q. What is your official job title here at
3 CoreCivic?

4 A. I am the lead field training officer at
5 Trousdale Turner.

6 Q. How long have you been in that position?

7 A. I've been in this position for a little over
8 a year -- or right under a year. January will be a
9 year, I'm sorry.

10 Q. And what was your position before that?

11 A. Investigative sergeant.

12 Q. Was that also with CoreCivic?

13 A. Yes, sir.

14 Q. How long were you in that position?

15 A. About a year, give or take a month or so.

16 Q. About a year?

17 A. Uh-huh.

18 Q. Have you had any other positions with
19 CoreCivic?

20 A. Yes, I have.

21 Q. What were they?

22 A. I had the -- I was the transportation
23 coordinator before I was -- I am sorry. I was the
24 armory sergeant before I was the investigative sergeant.
25 And I was in that position for approximately two years,

1 give or take a couple of months there. And then before
2 that, I was the transportation coordinator, which is a
3 senior correctional officer position. I was over the
4 transportation teams at the facility, coordinating when
5 the teams would go in and out. And also taking part of
6 those transportations. And then that was the job I had
7 out of class since I've been here. That was my first
8 position.

9 Q. Are you currently working at the Trousdale
10 correctional facility?

11 A. Yes, sir, I've been here my entire time.

12 Q. When you say your entire time, what do you
13 mean by your entire time?

14 A. Six years with the company. I have been at
15 this facility since -- all six years.

16 Q. For all six years that you've been with
17 CoreCivic?

18 A. Yes, and in corrections, yes.

19 Q. So you've been with CoreCivic the entirety of
20 your correctional career?

21 A. Yes, sir.

22 Q. What does your current position at CoreCivic,
23 what does to job entail?

24 A. So I am the lead field training officer. I
25 have a team of seven guys that are under me. We assist

1 in training of the staff as they come through their
2 initial course that they have before they become a
3 correctional officer, whether it's security training or
4 the initial training for some of our other -- the
5 foundational stuff, the basic first two weeks that
6 everybody gets. And then there's the other four weeks
7 worth of security training that they receive. So we
8 assist in that.

9 And then we make daily contacts on the
10 officers as a program to make sure they know what
11 they're doing everyday, that we can respond if they're
12 having any issues. We can teach them. We can do
13 correction on them. And then we can report those
14 findings. The guys, my team, they give me those
15 findings or the issues that they have throughout the
16 day, and they report them back to me. And then I can
17 share whatever I feel is necessary, as needed, with the
18 at ADO staff, the wardens, the chiefs, the AWs, and the
19 captains and lieutenants.

20 And then they can request from us, if there
21 is a need for us to focus on something to help the
22 officers, they see a common trend that they need or
23 something improved on, or if they know of an officer who
24 is struggling, they can request us to go spend some time
25 with them. And I can schedule one of my guys to spend

1 multiple hours of their day maybe with that one officer,
2 things like that.

3 Q. You said prior to that, you were an armory
4 sergeant?

5 A. Prior to that, I was the investigative
6 sergeant. And then prior to that I was the armory
7 sergeant.

8 Q. What did your job encompass as the
9 investigative sergeant?

10 A. As investigative sergeant, I was there to
11 assist the main investigator. She was my supervisor and
12 any type of incident regarding staff that may not be
13 correct or they're doing the wrong thing, what we call
14 dirty staff. Investigations into affairs and happenings
15 on the facility, whether it be assault, whether it be
16 contraband that we found, anything like that.

17 Looking into staff talkings and dealings.
18 Really, whatever the warden assigns for us to
19 investigate that maybe we needed to look at and have
20 more details on. If a staff member was assaulted, then
21 we would review that staff assault, interview those
22 inmates, talk about that. Help manage the affiliations
23 at the prison. Things of that nature.

24 Q. And then you said you were armory sergeant.
25 What did your job encompass as that?

1 A. So I was in charge of all of the security
2 equipment and accountability of all of the security
3 equipment for the facility. Tracking, adding, all of
4 the firearms, the munitions, the ammunition. All of the
5 munitions that we use and security equipment that we
6 have. It was my responsibility to make sure they were
7 serviced, cleaned, accounted for. Monthly reports on
8 anything that had to do with our inventory, whether it
9 changed, went up, went down. I ordered munitions as
10 needed or equipment as needed. And then was in charge
11 of tracking those in the facility monthly.

12 Q. So in your efforts as an investigative
13 sergeant, you kept track of various incidents,
14 contraband and things of that, right?

15 A. Yes.

16 Q. So you kept -- you would have put records,
17 some type of written records somewhere for that when you
18 logged those?

19 A. So for me I was the -- underneath the main
20 investigator, so if I had to go interview an inmate or
21 we recovered evidence from somewhere, then yes, we would
22 document the evidence or conduct the interview. I would
23 send my synopsis of my interview to her for submission
24 if it needed to be submitted or put into a record. I
25 didn't handle the records, the actual official records

1 of it, but I would give her the documentation and she
2 would file it officially, as far as any type of
3 contraband or item recovered. If I -- we would empty
4 the evidence box or we would have the item, and the
5 investigation department was in control of the evidence
6 side, yes.

7 Q. But there would be some records somewhere of
8 these incidents, right?

9 A. Yes.

10 MS. POLLY: Object to the form. You can go
11 ahead and answer, Mr. Knight.

12 THE WITNESS: When you say incidents, like
13 what incidents? Like every happening or --

14 BY MR. JACOBS:

15 Q. Well, everything that you investigated, as an
16 investigative sergeant?

17 A. It would be everything, yes.

18 MS. POLLY: Object to the form. Go ahead.

19 THE WITNESS: If I was a part of the
20 investigation, then it would get sent to her and -- my
21 boss, and then she would document it. So yes, I mean,
22 if there was an official investigation, there should be
23 a record of it.

24 BY MR. JACOBS:

25 Q. Okay, thank you. And I'll ask the same thing

1 regarding your position as an armory sergeant. You said
2 you kept track of all of the documents -- that you
3 documented or kept track of all of the equipment that
4 you were in charge of, and so there would be records of
5 that as well?

6 A. Yes, sir, the monthly reports were filed
7 monthly. And they'll be on -- they're on file for the
8 monthly reports, my signature and the warden's.

9 Q. Did you do anything to prepare for today's
10 deposition?

11 A. Just the predeposition with Ms. Polly
12 yesterday, just to kind of go over how it would go, make
13 sure I was set up for the Zoom meeting and kind of a
14 brief of how it would--

15 MS. POLLY: Mr. Knight, I am going to
16 instruct you not to answer there. Mr. Jacobs can't know
17 what we discussed.

18 BY MR. JACOBS:

19 Q. Yes, sir. Don't tell me anything that you
20 discussed with your attorney/client privilege. I just
21 wanted to know what you did. So you spoke with your
22 attorney, you stated?

23 A. Yes.

24 Q. Did you review any documents in preparation
25 for today's deposition?

1 A. I did not.

2 Q. To what extent are you familiar with the
3 details of this litigation?

4 A. Just from what I could tell from the original
5 one I looked up when I found out that I was going to be
6 a part of it. Some of the, I guess claims by Mr. Boaz.
7 Other than that, I don't know every little thing that's
8 going on, I just know the general that he's claiming.

9 Q. Are you familiar with any of the allegations
10 that are being made in this case?

11 A. Yeah.

12 Q. Which ones?

13 A. I believe -- I don't know them specifically,
14 I just know that some of them are religious-based over
15 some religious items that he would -- or freedoms, I
16 guess, that he would like to have here inside of the
17 facility. And maybe some claims of his safety and
18 security.

19 Q. Regarding the religious claims, what
20 specifically do you know in regards to that?

21 A. I don't know specifically all of them. I
22 don't know what he's requesting.

23 Q. That's fine. Just, you can share what you do
24 know.

25 A. I don't. I just know that he's requesting

1 something to do with his religious -- I believe he is
2 Muslim. And I don't know those items, or what they are,
3 or even how they function for his religion. It's not in
4 my department, as far as security. I don't have to deal
5 with it a whole lot.

6 MS. POLLY: Mr. Knight, to the extent that
7 any of the questions that Mr. Jacobs is asking you, to
8 the extent the answers that you give are based on
9 communications that you and I had, I am going to
10 instruct you not to answer. To the extent they're based
11 on other things you looked at or the things that you
12 know, you're perfectly fine to answer those.

13 THE WITNESS: Yeah.

14 BY MR. JACOBS:

15 Q. You also mentioned that some of the
16 allegations were regarding safety. Are you familiar
17 with those details?

18 A. I don't know what his details are, what his
19 claims are exactly. I just know, I think in there,
20 there were some issues with being understaffed or
21 something in the deposition or the thing that I read.
22 But I don't know exactly what he's referring to.

23 Q. And you said that you reviewed some -- how
24 did you come to this level of knowledge regarding the
25 lawsuit?

1 A. Just between the facility providing me with
2 the deposition and then letting me know I was part of
3 it. And then when I found out it was from Boaz, is the
4 name that was on it, I looked up the deposition. I just
5 slightly reviewed it to see if I could make sense of it.
6 I'm not a -- I don't do lawyer speak very well, so I
7 don't understand everything that's in there.

8 Q. You said you looked up the deposition, which
9 deposition?

10 A. The one that he had filed, I guess.

11 Q. Do you mean the complaint?

12 A. I am not sure what it is. I just know it had
13 -- I went online and typed up Boaz Pleasant-Bey in the
14 United States -- or in court or something, and this is
15 what popped up. And I noticed that that was -- looked
16 like it was pertaining to what we'd be talking about.
17 And this was before I was even scheduled for the
18 deposition or to actually be spoken to by you.

19 Q. Did anybody at CoreCivic speak to you about
20 the allegations of the case?

21 A. No, no. I mean, I know there's a few people
22 that are part of being -- I don't know what the word is.
23 They're having a deposition also, but we haven't talked
24 about any of that.

25 Q. So you haven't had any conversations with a

1 anybody about the allegations -- anybody at CoreCivic
2 about the allegations?

3 A. I am not even sure what the exact allegations
4 are, so...

5 Q. Okay. Mr. Knight, have you ever been
6 involved in any prior lawsuits pertaining to inmates?

7 A. I know that somebody had filed one. I don't
8 know if it officially went through, but I believe so.
9 There was one. Avery, I think, was that inmate's name.

10 Q. I'm sorry, could you say that one more time?

11 A. Inmate Avery, I believe. I don't know that
12 it ever went past being filed. I don't really know
13 officially when it becomes a lawsuit.

14 Q. Inmate Avery. Do you not remember Inmate
15 Avery's first name?

16 A. I don't.

17 Q. Do you recall any of the allegations that he
18 was making in regards to?

19 A. I don't know the exact allegations. I just
20 know it came in, so I gave it to the warden's secretary
21 in case we actually was pursued, and that way we would
22 have the information. I don't even know what it was
23 exactly about.

24 Q. Was that against you specifically, or was
25 that against CoreCivic?

1 A. I know I was named in it, but there was more
2 than just me named in it. So I am not for sure if it
3 was more than that.

4 Q. Are there any other lawsuits that you can
5 think of?

6 A. No, not that I am aware of.

7 Q. Are you familiar with the name Ricky Oliver?

8 A. I'm not.

9 Q. You're not?

10 A. No.

11 Q. So you don't recall being involved in a
12 lawsuit with an inmate named Ricky Oliver?

13 A. I've never had, to my knowledge, that I can
14 remember, had any -- had to testify, or talk, or give a
15 statement about -- I mean, there's a lot of inmates with
16 a lot of last names, but nothing that stands out,
17 Oliver. I don't know. I mean, if there is one, then
18 something may jog my memory, but I don't know of being
19 involved in any other lawsuit that I've had to testify
20 or talk about with anyone.

21 MR. JACOBS: I am going to stop the screen
22 share right now and I'm going to add what will be put in
23 as Exhibit 2.

24 (Exhibit 2 was marked.)

25 MR. JACOBS: Do we have that in the chat? I

1 am going to go ahead and share the screen, but I will
2 wait until you get it through e-mail.

3 THE WITNESS: I believe I have it now. Go
4 ahead. I've got it pulled up.

5 BY MR. JACOBS:

6 Q. Do you see on what is Page 2 of the document,
7 that which is labeled as Page 1 of the filing, do you
8 see where it says at the top, Ricky Oliver versus Daniel
9 Knight?

10 A. Uh-huh.

11 Q. Is that you?

12 A. It's my name. I am assuming it's me. I'm
13 not -- yeah.

14 Q. Do you remember -- does this jog your memory
15 and do you remember being named in this lawsuit?

16 A. I don't remember that I was named. But --
17 sorry, I'm reading the rest of it. What year was this?

18 Q. This memorandum it says was filed on January
19 13 of 2020.

20 A. Oh, 2020.

21 Q. I'm going to go down to Page 3, to what is
22 Page 3 of the filing document. Do you see where it says
23 allegations and claims?

24 A. Yeah, that's the part I'm reading right now,
25 I believe.

1 Q. Do you see where it says: Plaintiff claims
2 that the defendant, correctional officer Daniel Knight,
3 was deliberately indifferent to plaintiff's safety in
4 violation of his 8th Amendment rights?

5 A. Where is this at?

6 Q. First line after allegations and claims.

7 A. Yeah, I see that.

8 Q. Would you have any reason to disagree with
9 that being the nature of the allegations made in this --
10 in that particular lawsuit?

11 A. Yes, I disagree.

12 MS. POLLY: Object to the form.

13 BY MR. JACOBS:

14 Q. You said you disagree?

15 A. Yeah, I remember this now. I didn't
16 recognize the first name, but I recognize the incident,
17 I guess is how you would say.

18 Q. Okay, so you say you remember the incident?

19 A. Uh-huh.

20 Q. Could you describe for me in your own words
21 the particulars of the incident?

22 A. I believe I had gone down to the kitchen to
23 verify out-counts with someone because there was a count
24 number that was wrong. And then while we were verifying
25 the out-count, there were inmates in the kitchen that

1 were roughhousing, I guess. I didn't see it. I was in
2 the room with it. I just heard a thud. And when I
3 heard a thud, I turned around and Oliver -- that's what
4 I knew him as, I didn't know him by his first name.
5 Oliver was on the ground, it looked like he was having a
6 seizure.

7 So when I turned around and saw it, I
8 immediately called for medical code. And when the code
9 happened, we called, got medical in there. He was awake
10 and alert when they got there. They didn't have to do
11 any kind of compression. They almost didn't send him --
12 even send him out. And to my -- I walked into medical,
13 I believe. I walked him out of the kitchen with the
14 nurse, awake and everything. And then afterwards, I
15 found out they had to send him out to the hospital
16 because he had swelling on his brain.

17 After it had happened and they ran the
18 milestone back, you could tell and see that an inmate
19 was -- they had been -- it looked like they were just
20 roughhousing, wrestling, you know, playing with each
21 other, poking and prodding. But then you can see at one
22 point, the inmate, I don't even remember the guy's name,
23 puts his arm around his neck and squeezes real hard real
24 fast, and then the dude just falls out to the floor.
25 And that's when I heard the noise, and turned around,

1 and called the code. But I didn't see anything happen
2 before that.

3 Q. Are fights like that between inmates common
4 at Trousdale?

5 A. I didn't know it was a fight. I didn't know
6 that it was an assault, or a fight, or anything at that
7 point.

8 Q. Would you characterize that now as a fight or
9 as a violent interaction?

10 A. I mean, looking back at it -- looking at it
11 then, I thought it was just guys being guys,
12 roughhousing. That's the truth. I've seen inmates play
13 and, you know, come up behind each other. Grab each
14 other. Give a hug. Grab each other behind, just like
15 guys do at the house. And looking back, when it first
16 happened, that's what I thought had happened and they
17 just got carried away. You know, the results of it was
18 really bad, but I don't even know if it got classified
19 as an assault or not. I remember Mr. Oliver coming back
20 and having some issues because of it. But at the time,
21 I didn't know it was an assault.

22 Q. Okay.

23 A. But as far as assaults at the prison, I mean,
24 they happen. I just don't think that they're any more
25 or less -- what is the word? They're as sporadic as

1 anywhere. All prisons have issues, and assaults, and
2 inmates that fight each other or fight with the staff.
3 I don't know of it to be any more regular or irregular
4 than any other prison.

5 Q. Have you worked in any other prisons?

6 A. I've been to other prisons. I've worked only
7 at this one. But I have been on deployment as sort of a
8 member my first three years. And I've traveled and
9 trained at other facilities in the state and in
10 Kentucky, also.

11 Q. Is that the basis of how you are aware that
12 this is a common practice in other prisons?

13 MS. POLLY: Object to the form.

14 THE WITNESS: I'm sorry?

15 MS. POLLY: I was objecting, Mr. Knight. You
16 can answer.

17 THE WITNESS: Can you repeat the question?

18 BY MR. JACOBS:

19 Q. Sure. I was asking if that was the basis of
20 your knowledge as to whether such interactions were
21 common between inmates?

22 A. Yeah, I -- you know, we all have the same
23 job. I have friends that work at those facilities, and
24 I hear about what happens at those. I mean, we
25 transport and travel to other state facilities, TDOC-ran

1 facilities. You know, those issues are the same at a
2 lot of prisons. You know, you can go onto -- and see
3 the incidents at other facilities. I mean, it's a
4 common thing for -- it's not what we want, but it's
5 common for inmates to have issues. You put a bunch of
6 people together that aren't of the same -- I mean,
7 they're in prison for a reason. Sometimes people are
8 bad people that are in prison. It's our job to help try
9 to keep people safe from those.

10 Q. If you haven't worked at any other prisons
11 other than Trousdale, how can you say for certain that
12 Trousdale is the same as any other?

13 A. I didn't say they were the same. I said I
14 think it's very similar. From what I hear, the same
15 things that happen here happen at other facilities.

16 Q. What is the basis regarding that, when it
17 comes to violence?

18 A. I mean, all you have to do is look up the
19 incidents and see the reports, talk to the other people
20 that work at the other facilities and they can say, we
21 had an assault on staff today, or hey, we had two
22 inmates fighting today. The same things that happen
23 here happen at other prisons in the state.

24 Q. Have you reviewed any documents to that
25 effect, to the effect that, you know, regarding the

1 normality of Trousdale compared to other facilities?

2 MS. POLLY: Object to the form.

3 THE WITNESS: I don't know the statistics on
4 the statistics page that is listed. I don't go every
5 day and look at every incident at every facility that
6 happens.

7 BY MR. JACOBS:

8 Q. Have you conducted any studies regarding
9 this?

10 A. No.

11 Q. So is this based on only the things that
12 you've been hearing from other people?

13 A. And things that I have seen. There is a
14 TOMIS incident screen. So if I hear about an event, I
15 can look it up, the other facility, and see what's
16 happened at a state facility or another CoreCivic
17 facility inside Tennessee. I haven't reviewed that --

18 MR. JACOBS: Oh, I think we lost him. Let's
19 pause the record.

20 (Off the record.)

21 (Exhibit 3 was marked.)

22 BY MR. JACOBS:

23 Q. All right, Mr. Knight, so I am going to go
24 ahead and share the next document.

25 A. Okay.

1 Q. I am going to go ahead and share the screen.

2 A. Okay, I see. I don't know if I got the
3 e-mail yet. Hang on.

4 Q. Okay.

5 A. I have the e-mail.

6 Q. Did you say you have it?

7 A. I do. Exhibit 3, correct?

8 Q. Yes. Okay, do you see at the top of the
9 document, Page 2 of the document, Page 1 of the actual
10 disclosure here. Do you see at the top of the document,
11 this is regarding Boaz Pleasant-Bey versus State of
12 Tennessee, various defendants, including CoreCivic?

13 A. I do.

14 Q. Do you see where it says second supplemental
15 initial disclosures?

16 A. I see it, yes.

17 Q. Have you ever seen this document before?

18 A. No, I haven't.

19 Q. I am going to scroll down to Page 2 of this
20 document. Do you see Page 2, Paragraph F of this
21 document, starting with your name, Daniel Knight?

22 A. I see it.

23 Q. Do you see where it says, Daniel Knight has
24 knowledge regarding Pleasant-Bey's incarceration at
25 Trousdale?

1 A. Yes.

2 Q. The customs, policies, education and training
3 at Trousdale and the allegations in this lawsuit?

4 A. Yes, I see it.

5 Q. Would you say that this statement accurately
6 encompasses your knowledge regarding this lawsuit?

7 A. I guess. I don't know why he is
8 incarcerated. I know he's here and I am familiar with
9 the customs and policies, education and training here at
10 Trousdale. I don't know the exact allegations, so I
11 don't know that I have knowledge of it. And yeah, maybe
12 -- that last statement, yeah.

13 Q. So you say you didn't -- you don't have,
14 necessarily, knowledge regarding the allegations, and
15 partial knowledge regarding Pleasant-Bey's
16 incarceration?

17 MS. POLLY: Object to the form.

18 THE WITNESS: I'm sorry?

19 BY MR. JACOBS:

20 Q. I was saying, so are you saying that you
21 don't have a lot of knowledge regarding the allegations
22 in this lawsuit, and you have limited knowledge
23 regarding Pleasant-Bey's incarceration?

24 MS. POLLY: Object to the form.

25 BY MR. JACOBS:

1 Q. You can go ahead and answer.

2 A. I know the policies and procedures, and I
3 know the training here at the facility. I know that he
4 is incarcerated here. I don't know why he is
5 incarcerated. I don't know what his charge is. I don't
6 know what the allegations of that lawsuit is
7 particularly about.

8 Q. Okay. Have you ever met Pleasant-Bey?

9 A. Yes, I have.

10 Q. When was this?

11 A. I don't know the exact date or what year it
12 was, I just know that I've met him. I worked in
13 transportation. He used to work at intake. And so we
14 crossed paths. I know his face, and his name, and all
15 of that.

16 Q. How often have you interacted with
17 Pleasant-Bey?

18 A. Recently or in general?

19 Q. In general.

20 A. I probably haven't seen him and actually
21 spoke with him in over a year, that I can remember. I
22 mean, I may have said hello walking down the street --
23 or not the street, I'm sorry, walking down the walk.
24 And just, you know, good morning to the guys. But I do
25 that to a lot of the inmates. So you know, if he was

1 working in intake and I was in there, I would speak to
2 him, say hello. You know, if there was something going
3 on in that area that pertained to something that I
4 needed that he assisted with, as far as the intake of
5 property or cleaning up in the intake area, you know, I
6 would ask him. But not a whole lot of just personal
7 conversations.

8 Q. Do you recall having any personal
9 conversations with Mr. Pleasant-Bey?

10 A. We may have talked about football, or we may
11 have talked about something like that, but I don't
12 usually talk to the inmates about my personal life. If
13 he had said something about his personal life, he may
14 have, but I don't recall now.

15 Q. What else do you recall regarding your
16 interactions with Pleasant-Bey?

17 A. He seemed generally happy, always in a good
18 mood. Easy guy to talk to. A good, quote unquote,
19 inmate. I don't mean to make it sound like they're,
20 kids, but he was well behaved. Did his job well.
21 Wasn't hard to get along with or cause issues for
22 anyone, that I know of. You know, just a generally good
23 inmate that did what he was supposed to do.

24 Q. Mr. Knight, are you aware of CoreCivic's
25 agreement with the Tennessee Department of Corrections

1 regarding the Trousdale facility?

2 A. I am not sure what you mean by agreement.

3 Q. So are you aware that CoreCivic has a
4 contract with Tennessee Department of Corrections
5 regarding the Trousdale facility?

6 A. Yes. Our contract is to house their inmates
7 for them and provide for their care.

8 Q. Do you know what a compliance audit is?

9 A. I mean, I am not sure which audit you are
10 speaking of. But yes, I know that we have audits.

11 Q. What do you know about the audits?

12 A. Whether it's a TDOC audit, which is an audit
13 by our contractor, or we're their contractor. They can
14 come in and audit our happenings, what we're doing as a
15 facility, what we can provide as documentation as what
16 we're doing as a facility to meet their standards.
17 There's also an ACA audit, which American Correctional
18 Association audit where they come in and audit us to
19 make sure we're accredited and we're functioning in the
20 standards that we're supposed to have to be a prison.

21 And then also the CoreCivic internal audit is
22 the same type of audit, but where we self-audit ourself
23 to make sure that we're up to our own standards and our
24 own policies and procedures, while at the same time
25 being the same standard that our partner requires for

1 us, that being TDOC, in this case.

2 MR. JACOBS: I am going to stop the screen
3 share and I am going to go onto the next document, which
4 we will be entering as Exhibit 4.

5 (Exhibit 4 was marked.)

6 BY MR. JACOBS:

7 Q. Let me know when you get that document.

8 A. I have it.

9 Q. You see Page 2 of the shared document, which
10 is Page 1 of what looks to be -- do you see where it
11 says at the top of Page 1 of this document, says
12 commission on accreditation for correction standards
13 compliance initial audit? Do you see the year, it says
14 October 29th through the 31st of 2018?

15 A. Uh-huh.

16 Q. And you see this is regarding to CoreCivic
17 Trousdale Turner Correction Center in Hartsville,
18 Tennessee?

19 A. Yes.

20 Q. Okay. Have you ever seen this document
21 before?

22 A. I don't believe I've seen it.

23 Q. Have you ever seen anything like this
24 document before?

25 A. I've seen the results or they were

1 communicated, the results of the audit to us back in
2 2018, but I am not familiar with -- I don't think I've
3 seen a document like this. No, this looks like a
4 minutes top version of the audit and how it went. I've
5 never really seen this before.

6 MR. JACOBS: Hold on, am I sharing this,
7 guys? Did I forget to share this?

8 THE COURT REPORTER: It's not shared.

9 MR. JACOBS: Okay, I'm sorry. Let me make
10 sure I do that so that everybody can see what I'm
11 talking about. Okay, is everybody seeing this now?

12 BY MR. JACOBS:

13 Q. All right, Mr. Knight, if we could look at
14 Page 16 of the document. That would be Bates No.
15 CC2200.

16 A. Page 16, okay.

17 Q. Do you see the numbered Paragraph 3,
18 departmental visits?

19 A. Yes, sir.

20 Q. And then underneath it says: Team members
21 revisited the following departments to review conditions
22 relating to the departmental policy and operations.

23 A. Yes.

24 Q. Do you see further down where it says, for
25 the department, visited armory, and then it says

1 Sergeant Daniel Knight, is that you?

2 A. Yes, sir.

3 Q. Do you recall being revisited regarding the
4 audit or an audit in 2018 around this time?

5 A. If I was revisited, then there was probably
6 some type of finding within the area that either needed
7 to be checked on and fixed, if it was something that
8 needed to be fixed, or needed to be going forward,
9 something put into place. I am not sure what that was
10 in 2018.

11 Q. What is a revisit?

12 A. I don't really know when you call it a
13 revisit...

14 Q. Well, in the sentence above, it says: Team
15 members revisited the following departments.

16 A. I don't know -- I mean, I don't know if there
17 was something wrong and they came back. I don't know, I
18 am not familiar with the term revisit. They may have
19 had questions about something in the area or they needed
20 more documentation so they came back. I don't know what
21 the revisit was. Is that the same day or is that later
22 on in the audit? I don't recall without knowing exactly
23 if it was a finding or just they needed to come back and
24 look at it again.

25 Q. So toward the top where it says department

1 visited, and right next to, in the category where your
2 name is listed, it says persons contacted. So do you
3 remember ever being contacted in relation to an audit in
4 2018, or in the fall of 2018?

5 A. Any audit that we have, if you're in that
6 department and you get contacted, they come to your
7 area, and they ask for documentation, and ask you to
8 show the area and how it runs. And they give you
9 specific audit items they're looking for, inspection-
10 type things. And then you provide them the
11 documentation, or you provide them the information, or
12 the policy and procedure, or the picture of the item, or
13 whatever it is that they ask for, so...

14 Q. Do you remember being contacted in regards to
15 the armory?

16 A. Yeah.

17 Q. You do?

18 A. I don't remember the specifics, but I
19 remember that we were audited and I was the one in there
20 during the audit.

21 Q. Would there have been any documentation in
22 regards to this contact?

23 A. Yeah, I mean, whatever -- there's an audit
24 tool that they use, and that's what they would have used
25 to do the audit. And whatever they would have asked

1 for, monthly reports, inspection reports, cleaning
2 reports, chemical reports, whatever it is, you know,
3 they would have asked for it and I would have provided
4 whatever I had.

5 Q. And when you say ask, was that via e-mail or
6 was that in person-to-person conversation?

7 A. Typically, it's person to person. Sometimes
8 they may be in the room and ask for more documentation
9 and not bring it to them. Typically, they come to the
10 armory and they look at the armory. And they inventory
11 the items that are in their count. And they count and
12 make sure that, you know, there's supposed to be the
13 right things there, that all of the firearms are present
14 and accounted for and things of that nature.

15 MR. JACOBS: I am going to stop the share
16 screen and we're going to go onto the next exhibit,
17 Exhibit 5.

18 (Exhibit 5 was marked.)

19 BY MR. JACOBS:

20 Q. Once again, just let me know when you get it.
21 I'm going to go ahead and share the screen.

22 A. It's on the share screen, and I see it in the
23 e-mail now. Let me pull it up.

24 Q. Okay. Do you see what is Page 2 of the
25 shared document and the first page of the exhibit, where

1 it says, location, Trousdale Turner Correctional Center,
2 at the top?

3 A. Uh-huh.

4 Q. Do you see the date, it says January 31,
5 2020?

6 A. January what?

7 Q. I'm sorry. January 31, 2020.

8 A. Yes.

9 Q. We're going down to what is Bates No. 001381.

10 A. I don't know what that means.

11 Q. When parties exchange documents, what we do
12 to keep track is we put a label on the corners of them
13 that basically, that's just our way of keeping track of
14 what pages are what. So if you see at the top left-hand
15 corner here, there's the Bates number that says TDOC
16 001381?

17 A. Yes.

18 Q. So yeah, sometimes we just Bates number for
19 us. So do you see No. 001381?

20 A. Is that what page I need to be on?

21 Q. Yes.

22 A. There we go, yes.

23 Q. Okay. Do you see about mid page where it
24 says noncompliance item No. 2?

25 A. Yes, I do.

1 Q. Have you ever seen a document like this
2 before?

3 A. I have. I saw this -- I don't know if I saw
4 this document, but I know of this noncompliance issue.

5 Q. What are these documents, I am sorry?

6 A. This is showing that they had a repeat
7 finding with this issue. I have to read what the exact
8 finding is. Expiration dates (inaudible mumble)
9 employees have qualified over the last 12 months. So
10 it's a repeat finding during some audit. I am not sure
11 which audit this was a part of, but a repeat finding of
12 this happening.

13 Q. So you see where it says noncompliance issue,
14 Sergeant Flatt was issued an Mk4 OC canister?

15 A. Uh-huh.

16 Q. What is an Mk4 OC canister?

17 A. Mk4 stands for Mark 4, I believe that's their
18 model number for the OC. OC stands for oleoresin
19 capsicum. It's an inflammatory agent, so it would be
20 their can of OC, or their can of inflammatory agents.

21 Q. And it says, the next -- same line: Flatt's
22 certification for OC expired in 7/2 of 2019.

23 A. Yes.

24 Q. Are sergeants supposed to be certified to
25 handle such equipment?

1 A. If they're using it. They're not required,
2 no. But for certain issues, they are. If they're going
3 to be issued it, then they have to be certified.

4 Q. Do you see a couple of lines underneath, it
5 says: Action taken by TDOC contract monitor, armory
6 Sergeant Knight. Is that you?

7 A. Uh-huh.

8 Q. Do you recall -- and it says that you were
9 notified on --

10 A. I believe this was an audit that Mr. Walton
11 conducted. He has a quarterly check or something like
12 that, that he comes in and audits us from time to time
13 off the instrument. And I believe when he came down to
14 go through it with me, we discovered the violation or
15 the mishap, it being issued out when he wasn't. And we
16 talked with Warden Washburn, the three of us together.

17 Q. So you do recall the details of this
18 incident?

19 A. Fairly well. I mean, not every letter of it,
20 but it's familiar, yes.

21 Q. Is there any reason that you would have to
22 disagree with the statement, the noncompliance issue in
23 that it was regarding Sergeant Flatt?

24 A. No, I don't have any reason to disagree.

25 Q. If we can turn to TDOC Bates No. 001382. And

1 we're at looking noncompliance item No. 3. And it says
2 right here: Noncompliance issue on December 9, 2019,
3 the CM inspected and determined jump bag No. 5 was
4 missing six 38 caliber rounds of ammunition. Facility
5 leadership is aware and actively conducting searches.
6 Do you see that?

7 A. I do.

8 Q. And do you see a couple of sentences down
9 where it says actions taken by TDOC contract monitor,
10 and it lists armory Sergeant Knight?

11 A. Uh-huh.

12 Q. Is that you?

13 A. It is.

14 Q. Do you recall the details of this particular
15 issue?

16 A. I do.

17 Q. Do you recall the missing 38 caliber rounds?

18 A. Yes, I do.

19 Q. Do you recall how this was resolved?

20 A. I discovered -- I found the rounds. There
21 was -- I don't remember exactly what it was. But after
22 a team had gotten done with the hospital post, they put
23 their equipment and everything in a bag. Evidently, it
24 was after hours, not while I was here. And they had
25 return of the equipment to the armory. And when

1 whoever, I don't even know who received it, received it
2 and put it back in the armory in our -- it's an
3 emergency box where it has the equipment that somebody
4 would need quickly to go out on a trip that had to be
5 armed. When they put it back, evidently, they didn't
6 verify that all of the equipment was in there.

7 So when I came in that morning, like I do
8 most mornings, and I go through everything and I make
9 sure everything is signed back in correctly. Or if it's
10 signed out incorrectly, I notify someone if they didn't
11 sign something out correctly. Then when I did my
12 inventory, it was missing. I am the one that notified
13 the shift supervisor and the chief of security there.
14 So immediately after I discovered it and I couldn't
15 figure out what was going on, after contacting, I
16 notified them.

17 And then after a search of the vehicle that
18 the staff had used the night before, it was found that
19 it had fell between the seats. Evidently, it had rolled
20 out of the bag and they didn't know it. So that was it,
21 after, you know, discovering and locating the
22 ammunition, it was put back in the armory. And our
23 numbers were what they were supposed to be at that
24 point.

25 Q. Where did you say that the ammunition was

1 discovered?

2 A. In the vehicle, the facility van, between the
3 seats.

4 Q. Are inmates transported in that facility van?

5 A. Not in the same area as that would be at all.

6 Q. But they are transported in that van?

7 A. Yes, they are. But at that time, it was
8 discovered before there had been another transport.

9 Q. Okay. We can turn to Bates No. 001462. Do
10 you see where it says noncompliance issue in the middle
11 of the page?

12 A. I do.

13 Q. Do you see where it says on February 19,
14 2020, J. Cude was issued an Mk4 OC canister for
15 transport detail? Mr. Cude's certification for OC
16 expired, it says 6/18/19?

17 A. Yes, sir.

18 Q. Do you see in the red writing where it says
19 per the monitoring instrument for security equipment
20 Item 3 has been determined to be an essential monitoring
21 item which may result in a notification of breach?

22 A. Yes.

23 Q. Do you see right after that, it says,
24 liquidated damages were assessed on 3/16/2020 for the
25 NCR?

1 A. Yes.

2 Q. Do you see a couple of lines down where it
3 says, action taken by TDOC contract monitor?

4 A. Uh-huh.

5 Q. And do you see it says, armory Sergeant
6 Knight was notified?

7 A. Yes, I believe this was another audit that we
8 had done together.

9 Q. Do you have any reason to disagree with these
10 statements that are presented here in this document
11 regarding this issue?

12 A. I'm reading the details of the after action,
13 hang on one second, please. Yeah. I agree. I mean, is
14 it important to note that these are not -- I'm not sure.
15 This is not -- it doesn't list who actually issued the
16 items out in the document. So the way that it works is,
17 is that they have an armory, and in the armory, if I'm
18 not there or even if they go to central control and
19 where I make sure that there's OC canisters available
20 for the staff, it's -- it could be somebody different
21 either issuing it or signing it in or out.

22 So if another staff member is the one to do
23 that, it falls underneath my area and the chief of
24 security's area, which is who I reported to at that
25 time, to come up with some sort of a procedure -- or

1 actually, the chief and them will, you know, decide on a
2 disciplinary and all of that. But I just wanted to make
3 sure that that's, you know, clear. That it's not -- it
4 doesn't list who issued it to him. It would have been
5 -- you can say it was the facility, but...

6 Q. But do you have any reason to disagree with
7 the statements as they are written here regarding this
8 particular noncompliance issue?

9 A. No, no.

10 Q. Moving to Bates No. TDOC 2402. Do you see in
11 the middle of the page where it says noncompliance No.
12 1?

13 A. You said 2402?

14 Q. Yes.

15 A. Sorry, it's just bigger when I look at it in
16 the e-mail. I can't see it good on the share screen.
17 2402, all right.

18 Q. Do you see where it says noncompliance No. 1?

19 A. I do.

20 Q. Do you see where it says, underneath
21 noncompliance issue: On 9/28/20, the contract monitor
22 audited the standards and identified senior correctional
23 officer Daniel Knight was listed on the list of all
24 individuals qualified to carry weapons. Do you see that
25 part?

1 A. I do.

2 Q. Is that you?

3 A. It is.

4 Q. Going down slightly below, with the sentence
5 stating: Upon checking. Do you see that sentence?
6 Just one line down. Upon checking.

7 A. Hold on, I got lost. Which one?
8 Noncompliance issue, 9/28/2020, The contract monitor --
9 that one?

10 Q. Yes. Same paragraph, noncompliance issue,
11 that we were on. The next sentence, it says: Upon
12 checking SCO Knight's training. Do you see that
13 sentence?

14 A. Oh, there it is in the middle. Yes.

15 Q. Do you see where it says: Upon checking SCO
16 Knight's training, filed the most current firearm
17 certification on file was dated 5/2/2019?

18 A. Uh-huh.

19 Q. It says: In addition, the facility was
20 educated that firearm qualifications are annual
21 requirements and no user should have an expiration date
22 that extends beyond 12 months from the date of review.

23 A. Yes, I see that.

24 Q. Do you remember the details of this incident?

25 A. I do. There was some type of confusion on

Page 47
1 the standard. I am a firearms instructor, actually, for
2 the facility. And I have an instruction license through
3 the NRA and have taught multiple, multiple, multiple
4 classes since 2018, I guess. And I guess the issue was,
5 is that somewhere in the L and D, they didn't file where
6 I had signed a 42A as the instructor and shot. They
7 didn't know that it wasn't on there. So they had to go
8 back and look at it and see how it was supposed to be
9 because, by our standard at the time, I believe it was,
10 if you were an instructor, and you instruct the class,
11 and you're a repeated instructor in speciality courses,
12 then you are certified as a user.

13 And I guess when they looked into it, they
14 wanted documentation beyond what me just teaching the
15 classes that I had -- that by teaching the classes, it
16 made me certified. They needed some kind of a
17 documentation of that. So when they looked at the last
18 time that I actually took the class, not as an
19 instructor, it was more than a year. So somebody in the
20 L and D, I think, had not put in the credit for me
21 teaching the class. If you teach the class multiple
22 times, then you're certified as a user. And I think
23 that was the issue that they were trying to work through
24 after that. I don't know what the results of that was,
25 but yeah.

1 Q. So your testimony is that someone forgot to
2 put in your accreditation regarding your ability to
3 carry a weapon?

4 A. Yes. I mean, I had taught the class --
5 basically, you would come and I would be an instructor
6 for the class. And so by me teaching the class, it's
7 supposed to be given credit for as doing it, you know,
8 because you're teaching someone something that you're
9 proficient in. As long as you teach the course and you
10 stay up to it and document that you are the instructor,
11 it's supposed to give credit in the system. So
12 evidently what happened is, it didn't go into the
13 system, and they wanted something to show me more so as
14 it. So I don't know for sure exactly what they decided
15 after that point, but yes.

16 Q. Have you ever experienced any other occasions
17 where certifications regarding the carrying of weapons
18 have not been properly put into the system?

19 A. Sometimes there's a delay once it gets put
20 in. So, you know, you could take the class today, it
21 may take tomorrow, or the next day, or the day after for
22 it to get put into the system.

23 Q. Do you see the line right after that written
24 in red, where it says: Note per the monitoring
25 instrument for security equipment item No. 2 has been

1 determined to be an essential monitoring item which will
2 result in a notification of breach?

3 A. Uh-huh.

4 Q. Okay, do you see the next line, which
5 continues to the next page, but also what is written in
6 red on that line: A liquidated damages letter was
7 issued on 6/3/20 for NCR. Do you see that?

8 A. I do.

9 Q. Do you have any reason to disagree with the
10 details set out in this report?

11 A. No.

12 MR. JACOBS: I think we're going to take a
13 little break, three minutes. And we'll be back right
14 after that.

15 (Recess observed.)

16 MR. JACOBS: So we're going to go a little
17 bit out of order here. I am going to go ahead and share
18 the next exhibit. And we have this marked as Exhibit 8.

19 (Exhibit 8 was marked.)

20 BY MR. JACOBS:

21 Q. Just let me know when you get it.

22 A. Okay. I see it, Exhibit 8.

23 Q. Do you recognize this document?

24 A. Give me just a second. It looks to be some
25 type of notice. I don't recognize it specifically, no.

1 Q. Have you ever seen this type of document
2 before in any other medium?

3 A. It looks like one of Investigator Woods'
4 investigation synopsis sent to the warden. I believe
5 that's what it is, for sure, I just haven't seen this
6 document.

7 Q. Do you see the subject line that says
8 regarding Hubbard, Clyde, at the top?

9 A. Yes.

10 Q. Do you see the date, January 28, 2021?

11 A. I do.

12 Q. Looking at the first page of the document,
13 Bates No. CCI 7483. If we could look at the second-to-
14 last paragraph, where it starts off by saying response.
15 Do you see that?

16 A. The last response before the page ends?

17 Q. Yes.

18 A. I see it.

19 Q. Do you see where it says: On September 1st,
20 2020, investigative sergeant Daniel Knight conducted a
21 search of Delta Charlie No. 205 housing inmate Hubbard
22 Clyde. Do you see that?

23 A. Yes.

24 Q. Is this you, Mr. Daniel Knight?

25 A. It is.

1 Q. Do you see the very next line underneath, it
2 says: Where a six-inch piece of metal was found
3 sharpened to a point?

4 A. I see it.

5 Q. Okay, do you recall this incident?

6 A. I remember searching this cell. I remember
7 finding something. I didn't -- if you had asked me what
8 I found, I couldn't have told you, but I do remember,
9 now that it's up there, searching this cell and finding
10 something in the cell.

11 Q. If you could turn to Page 5 of the exhibit.
12 Bates No. CCI 7490.

13 A. Okay.

14 Q. Do you see what looks to be a webpage?

15 A. It's a TOMIS page, yes.

16 Q. Are you familiar with this website?

17 A. Yeah, it's the system that is used to track
18 things for the inmates. A lot of things. It's the
19 department of corrections, actually, site.

20 Q. What does E TOMIS stand for?

21 A. I don't know exactly what it stands for.
22 That's a really good question. I don't know. I just
23 know it's the system that Tennessee uses to input
24 everything, incidents, disciplinary, housing, trust
25 funds, case notes. It's their system that we use to

1 officially enter things for TDOC.

2 Q. Have you ever used this website before?

3 A. I have.

4 Q. Have you entered incidents?

5 A. I have.

6 Q. Violent incidents regarding inmates and/or
7 staff?

8 A. Usually not staff. I don't think I had any
9 staff, but inmates, yes.

10 Q. Did you enter this incident that is shown
11 here?

12 A. It looks like I did.

13 Q. Do you recall doing that?

14 A. I've entered so many disciplinaries and
15 incidents, I don't recall this one specifically. But it
16 has my staff I.D. and stuff on there, so I am assuming
17 it was me.

18 Q. You enter a lot?

19 A. I did, especially when I was in
20 investigation. Not as much now, but I did.

21 Q. If we go down to the next page, which is
22 listed Bates No. CCI 7491.

23 A. Uh-huh.

24 Q. Do you see the description section?

25 A. What page number? It was just the next page

1 down, right?

2 Q. Yes, CCI 7491.

3 A. Okay, yeah.

4 Q. Do you see where it says incidents at the
5 top?

6 A. Yes.

7 Q. And then underneath that, it says
8 description?

9 A. Uh-huh.

10 Q. And in the description, it says:
11 Investigator Knight was assisting with cell searches in
12 Delta Charlie. While searching cell which housed inmate
13 Hubbard, inmate McCauley found one six-inch homemade
14 weapon hidden in the cell. Do you see that?

15 A. I do.

16 Q. Did you input this description?

17 A. I did.

18 Q. Is it your understanding that this is the
19 same incident that is referred to above in the other
20 document?

21 A. I believe so.

22 Q. If we can scroll down to the next page, which
23 is Bates stamped CCI 7493.

24 A. Uh-huh.

25 Q. Do you see that?

1 A. I do.

2 Q. What is that an image of?

3 A. It's an image of the item found in the cell,
4 it looks like, sharpened metal object to a point. I
5 can't see the whole picture, it's sideways on me. I'm
6 sorry if I look funny turning my head.

7 Q. Is that a picture of a knife, or a homemade
8 knife?

9 A. Yeah, that's what we would call a homemade
10 weapon, or a knife, or a shank. People call it a lot of
11 things.

12 Q. Is that a ruler that's next to it?

13 A. It's a ruler sheet. So it's a photocopied
14 ruler paper, so it's there for reference.

15 Q. Do you guy keep ruler sheets at the facility?
16 Is that standard paperwork?

17 A. It's not standard. We use it as a reference
18 point. It's just something so that you would have kind
19 of a visual on size reference. That's not a required
20 document right there, we just use it to help make it
21 easy when you take pictures just to keep up with
22 information. Sometimes people don't have them
23 available, depending on where they find it.

24 If we're in a cell or somewhere, we're having
25 to process and we don't have it. But we just use a

1 sheet of paper with a -- with the same information. We
2 would write, you know, what cell it was in, and where it
3 was found, and what it looks like, and something to
4 reference the size.

5 Q. But is it a sheet that is commonly used?

6 A. Yes, yes.

7 Q. Did you fill out the details on this sheet?

8 A. I did not.

9 Q. You did not?

10 A. Huh-uh.

11 Q. Do you know who would have?

12 A. I don't. I just know that's not my
13 handwriting.

14 Q. Do you see next to -- do you see on the ruler
15 sheet, can you make out the length of the weapon?

16 A. It looks like six inches. I think that's a
17 six. I can't see the numbers, but if those are all
18 inches, then I believe it is. It's six inches.

19 Q. Is that the typical length of weapons that
20 you find at the facility?

21 A. They're various.

22 MS. POLLY: Object to the form.

23 BY MR. JACOBS:

24 Q. You can go ahead and answer.

25 A. There's various types of different lengths

1 and different materials.

2 Q. Like what? What types of materials?

3 A. I mean, metal. A tooth brush. You know,
4 before we got rid of soda pop cans, cans. Bunk metal.
5 Different items like that. I mean, there was a time
6 they would use plastic totes to try to sharpen an end
7 to.

8 Q. In your time as investigative sergeant, did
9 you find a lot of these type of weapons?

10 A. The type in the picture?

11 Q. Yes.

12 A. I would say I might have found the same as
13 when I wasn't an investigator. I mean, I've always been
14 a part of response teams, and search teams, and stuff
15 like that, even before. So I've found plenty of
16 weapons, yes.

17 Q. I am going to stop the share. And we're
18 going to pull up the next document on the list. We're
19 going a little bit out of order, but this is what we
20 have listed as Exhibit 10.

21 (Exhibit 10 was marked.)

22 BY MR. JACOBS:

23 Q. I'm going to go ahead and share the document
24 and just let me know when you get it.

25 A. Okay, I have it.

1 Q. Okay, do you see the second page of the
2 exhibit, which is the first page of the actual document,
3 listed CCI 53407 Bates No. Do you see that?

4 A. What is the number again?

5 Q. CCI 53407.

6 A. Yes.

7 Q. Do you recognize this type of document?

8 A. I do.

9 Q. And what type of document is this?

10 A. It looks to be a synopsis sent from either a
11 shift supervisor or assistant shift supervisor over
12 something that had happened at the facility, sent to
13 either the -- let me see. Looks likes the AW. Sent to
14 the AW, then, so they can notify that there was a
15 physical handling.

16 Q. Is this the typical way that these type of
17 reports are sent, via e-mail?

18 A. Yes, I mean, sometimes it's just a quick
19 synopsis until an official report can be done, or
20 official synopsis can be done. And then, I believe this
21 might be entered into the 5-1 system. This is typically
22 how the flow of information goes.

23 Q. I'm sorry, you said entered into the what
24 system?

25 A. The incident system. So they have to put it

1 into the 5-1 in the TOMIS system. It may not be the
2 exact wording, when you look at it in TOMIS. Sometimes
3 these are done quickly right after a situation, and
4 other details come up, but yeah.

5 Q. Is the 5-1 system and the E TOMIS, the one
6 that we discussed earlier, are those the same systems?

7 A. The 5-1 is our system for reporting and the E
8 TOMIS is TDOC's.

9 Q. So am I correct in that you are stating that
10 the 5-1 system is the CoreCivic system where incidents
11 are reported, and the E TOMIS is the Tennessee
12 Department of Corrections system where incidents are
13 reported?

14 A. Yes.

15 Q. And do you input the same material into both
16 systems? That is to say, the descriptions and the
17 details, are those the same in both system?

18 A. I have not had to enter into 5-1 but once, so
19 I am not a hundred percent sure on how that works. But
20 to my knowledge, is that they're very similar, we just
21 have to have for our tracking purposes and TDOC requires
22 us to use theirs. I don't think that you upload
23 pictures and things like that inside of the TOMIS
24 system, but we have that capacity so that we can keep up
25 with the pictures to the 5-1.

1 Q. And you said that you remember putting
2 something in the 5-1 system once. Do you recall what
3 that was regarding?

4 A. I don't. Typically, I would give any
5 findings, when I was the investigative sergeant, to my
6 boss investigator. And she would put those incidents in
7 if it was something. If we had a fight or, you know,
8 like the weapon that you saw earlier, you know, that is
9 stuff that gets put into the system. But typically, the
10 captain, the lieutenant and the investigator would put
11 those in.

12 Q. So is it fair to say that anything entered
13 into the E TOMIS system should have a matching input in
14 the 5-1 system?

15 A. I guess it depends on the level of the
16 incident.

17 Q. So not all of the incidents that are shared
18 in the 5-1 are also put in the E TOMIS system?

19 A. I can't say for certain. I would think that
20 they are, but I can't say for certain.

21 Q. Looking back, turning back to the document,
22 do you see where it says: Subject use of force,
23 physical handling?

24 A. Yes.

25 Q. Do you see underneath, with the date and time

1 of the incident, March 8th, 2021?

2 A. I do.

3 Q. Going down to where it says: Staff involved,
4 correctional officer Adam Wilson, senior correctional
5 officer Daniel Knight. Is that you?

6 A. It is.

7 Q. Going down to the brief description of the
8 incident. It states: On March 8th, 2021, inmate
9 Corbitt, Tyler AE 206 lock was compromised due to him
10 popping the lock with string made from his bed sheets.
11 Do you recall this incident?

12 A. I do recall this incident.

13 Q. Okay, what happened in this indent?

14 A. For me, there was a call that there was
15 resistance in Alpha unit. And so when I came -- I think
16 my office was in Alpha at this point. I came out and
17 responded to the area. And when I came out, there was
18 an inmate trying to assault another inmate with a
19 weapon. I didn't know that's what was going on, I just
20 saw them running down the stairs. The door was open and
21 they came out the door to the rotunda where I was at.
22 And realized that they were fighting, one was trying to
23 get the other one.

24 So I tackled both of them. Once I tackled
25 both of them, and had them -- I was in between them on

1 top of one and pushing the other one away. I noticed
2 that one of them had a weapon. So I took the weapon
3 from the inmate and separated the inmates. And then
4 Wilson -- I don't even know if it was Wilson and I, but
5 another officer who responded put them -- made sure they
6 were in restraints, and separated, and seen by medical.

7 Q. Do you see the next sentence right after the
8 one we were talking about, where it starts by saying:
9 Upon the lock being taken apart. Do you see that
10 sentence?

11 A. Yes: Upon the lock being taken apart, there
12 was nothing in the lock that compromised it and
13 maintenance came to evaluate the lock.

14 Q. Yes. And do you also see right after where
15 it says that everything was in working order with the
16 lock?

17 A. I see that, yes.

18 Q. Is that concerning to you?

19 A. I don't know. I mean, yes and no, it just
20 depends -- I don't know what the situation was.

21 Evidently, there was nothing wrong with the lock. It's
22 not a good thing for them to be able to shim their locks
23 or shim their doors that way. But I do believe that
24 after this incident, they were looking to address and
25 figure out a solution to it.

1 Q. So I guess what I'm asking is, as someone who
2 works there, as a sergeant, as someone who, I suppose,
3 has to look after the care of various staff members, as
4 well as the inmates, is it concerning to you that a lock
5 that is supposedly in perfect working order can be
6 opened, popped open by an inmate? Is that concerning to
7 you?

8 A. Yeah.

9 Q. It is?

10 A. It could be. I mean, we're around them
11 everyday, not behind a locked door. So at any moment,
12 you know, something could happen, whether behind a
13 locked door or not. So I have never heard of it, you
14 know, being a housing unit door or a pod door. But you
15 know, we're around 128, 300 inmates in the chow hall
16 everyday. So when you say, is it concerning, from a
17 standpoint of if I needed that person to stay behind the
18 door for sure, then yeah, that's the idea of the door
19 and the reason that it's there.

20 But we're around these guys everyday. And I
21 feel like it's very controlled. And so -- sorry
22 somebody was knocking on my door. I know it looked
23 funny, probably, there. But yeah, it can be concerning,
24 but at the same time, you know, we're used to being
25 around inmates, you know.

1 Q. But that's not the way it should typically
2 operate, right? A door should not be --

3 A. Oh, yes, yes, for sure.

4 MR. JACOBS: I am going to stop the screen
5 share and I'm going to go to next --

6 THE WITNESS: Just one second, please.

7 MR. JACOBS: Yeah. Let's go off the record.

8 (Off the record.)

9 (Exhibit 11 was marked.)

10 MR. JACOBS: I'm going to be sharing Exhibit
11 11, what has been marked as Exhibit 11. And now I'm
12 going to share the screen.

13 BY MR. JACOBS:

14 Q. Let me know when you get it.

15 A. Okay. Exhibit 11.

16 Q. Yes, so looking at Page 2 of the exhibit,
17 which is officially the first page of the actual
18 document, which is Bates numbered CCI 48594. Do you see
19 this document?

20 A. I do.

21 Q. What is this document?

22 A. It's the synopsis of a cell search and
23 investigation that myself and I guess Cassada.

24 Q. Do you see at the top where it says: This is
25 from Knight, Daniel. Is that you?

1 A. It is.

2 Q. Do you see the date, December 3rd, 2020?

3 A. Yep.

4 Q. Going on into the body paragraph, the first
5 line. It says: I, investigative Sergeant Knight, was
6 informed by K9 Cassada that he had spoken to an inmate
7 informant. The informant stated that he knew an inmate
8 that had a blue CoreCivic uniform shirt. Do you see
9 that?

10 A. I do.

11 Q. K9 Cassada, what does canine stand for?

12 A. K9 Cassada, so he's a handler. That actually
13 should probably be K9 officer Cassada. He is the
14 officer that is in charge of the K9 dog here that is
15 used for searches.

16 Q. And it says that he had spoken with an inmate
17 informant?

18 A. Uh-huh.

19 Q. Do you have a lot of inmate informants at
20 Trousdale?

21 A. I mean, there's a lot of inmates that will
22 tell a lot of things if they think it's to their
23 advantage and they can get something from it. Sometimes
24 they need help, and sometimes they just want to get
25 somebody in trouble. So sometimes people just tell on

1 somebody else because they can.

2 Q. Do you make it to their advantage?

3 A. If we can help them with a situation, then
4 yeah. I mean, if somebody helps us out, we have no
5 problem helping, if it's something that's reasonable
6 within a scope; not special privileges or things of that
7 nature. But if the guy was like, you know, I would like
8 to move to another housing unit, you know, I have this
9 information. Let me see if I can make that happen. If
10 he lines up with that and he's got the right
11 qualifications to live in that housing unit, then there
12 is no reason not to.

13 Q. Do you find your informants to be helpful?

14 A. Some are. Some are not telling the truth. I
15 mean, it's just -- it's random. You know, you can't run
16 down every lead. You know, if an inmate makes another
17 inmate upset about something, we can get a random letter
18 in our in-house mail that the inmate doesn't identify
19 himself, who he is, and say, you know, cell DC202 has a
20 phone in it, or a weapon, or something that doesn't
21 belong. And then we go search that cell and there's
22 nothing there. I mean, that's more likely to happen
23 than actually the information to be true.

24 Q. Is it your desire that these inmates or
25 informants be kept safe?

1 A. Yeah. And anonymous, if need be. If it's
2 their preference. Some of them don't ask to be.

3 Q. Be safe from other inmates?

4 A. Yes, be safe in general, yes. A lot of
5 people, they don't ask for any moving of housing or
6 anything, they are fine. They just talk to us and tell
7 us. And then if they have an issue or a problem, then
8 yeah, we'll take care of it. I mean, that's our job, is
9 to keep them safe. It's not always an issue for an
10 inmate to tell something to another inmate.

11 Q. Going to that -- following that sentence, the
12 next line, we already read it, but saying: He knew of
13 an inmate that had a blue CoreCivic uniform shirt. Did
14 you guys find that shirt?

15 A. We did.

16 Q. Was an investigation done regarding this
17 shirt that was a CoreCivic uniform shirt?

18 A. I mean, this is my synopsis of that night and
19 turned over to the investigator and the ADO staff. So
20 they interviewed him and he was interviewed by other
21 ones. I believe he was interviewed by TDOC, but I can't
22 quote that for sure. I am not sure what the
23 investigation was.

24 Q. Do you know if it was ever discovered how he
25 got possession of the shirt?

1 A. No, the story he told me is that -- the first
2 story he told me was that he found it in a trash can.
3 And then another story that he told me is that he got it
4 from another inmate. To my belief, I think somebody had
5 changed their shirt and left it, and somebody picked it
6 up and didn't report it. And then this is just us
7 finding it later.

8 Q. So you weren't able to confirm or conclude
9 where he was able to get the shirt?

10 A. I wasn't. And I am unaware if they further
11 reviewed it, if the main investigator further reviewed
12 it and have an answer. This document right here is just
13 my e-mail notification of that night. It's not a final
14 investigative synopsis. Does that make sense?

15 Q. Uh-huh. Is it concerning to you at all that
16 an inmate was able to get their hands on a CoreCivic
17 uniform shirt?

18 A. Oh, yeah, definitely.

19 Q. Is it concerning to you that there seems to
20 be no conclusion as to how he was able to get his hands
21 on the shirt?

22 A. Like I said, I don't know if there was or was
23 not a conclusion to it.

24 Q. Is it concerning to you that this shirt went
25 missing and it wasn't reported by staff?

1 A. Yeah, if the staff member was missing it,
2 that is concerning that they wouldn't report it.

3 Q. Would that sort of thing be of a safety
4 concern for both the staff and the inmates?

5 A. Yes, of course.

6 MR. JACOBS: I'm going to pause. Go off the
7 record really quick.

8 (Off the record.)

9 BY MR. JACOBS:

10 Q. Mr. Knight, we're just about done here. I
11 just have a few closing questions that I just wanted to
12 address. So if you remember back toward the beginning
13 of the deposition, we pulled up the disclosures that
14 talked about the things that you would be knowledgeable
15 about to testify. So I just want to make sure that
16 we've covered everything that you will be -- that you
17 have knowledge of and you will be testifying about if
18 this should go to trial.

19 A. Okay.

20 Q. So based on what we've discussed, have we
21 discussed everything you know regarding Pleasant-Bey and
22 his incarceration? Have we discussed all of your
23 knowledge regarding that?

24 MS. POLLY: Object to the form.

25 BY MR. JACOBS:

1 Q. You can answer.

2 A. We haven't talked about why he was
3 incarcerated or his issues with me. I am not sure what
4 the question is asking.

5 Q. I am asking if we've discussed everything
6 that you have knowledge of regarding Pleasant-Bey and
7 his incarceration?

8 A. Oh, that I have knowledge of. I believe so,
9 yes.

10 Q. So we discussed everything that you would be
11 able to testify at trial, regarding Pleasant-Bey and his
12 incarceration?

13 MS. POLLY: Object to the form.

14 BY MR. JACOBS:

15 Q. You can answer.

16 A. Yeah, I mean, there may be other details that
17 weren't brought out that I could testify, depending on
18 the questions.

19 Q. You said that there were other details? What
20 other details?

21 A. I don't know that there are or there isn't.
22 I don't -- if this is the only questions I was to be
23 asked at court, then yes. But if there were other
24 knowledge, hey, did you, you know, see Mr. Pleasant-Bey
25 on the 15th, and I remember having an interaction, I

1 could, if you ask me about it. But I don't have it
2 right there right now.

3 Q. Have we discussed everything you know
4 regarding what is stated to be the customs, policies,
5 education and training at Trousdale? Have we discussed
6 everything you know regarding that?

7 MS. POLLY: Object to the form.

8 THE WITNESS: We haven't discussed
9 everything. I mean, we didn't really talk about the
10 training, what I do as a trainer or training process, if
11 that's what you're asking.

12 BY MR. JACOBS:

13 Q. And what do you do in the training process?

14 A. I mean, the classes come in and we go through
15 the curriculum as it's provided by the facility and the
16 state. And we make sure that they have that and that
17 they get their training and what they're required to
18 have. And then we spend time with them, provide time
19 with them on the floor daily with training to make sure
20 that they're still at the same standard on a daily
21 basis, weekly basis. Spot checks and inspections. A
22 lot of books. And looking at their performance and
23 making corrections and reporting quarterly.

24 Q. Anything else?

25 A. No, I mean, I think we're -- I don't think I

1 am understanding where the questions are going. I'm not
2 sure what --

3 Q. I'm just covering to make sure that we
4 covered everything that counsel has stated that you have
5 knowledge on as far as a witness is concerned.

6 A. Oh.

7 Q. That's all. Okay. Have we discussed
8 everything that you know of regarding the allegations of
9 this lawsuit?

10 MS. POLLY: Object to the form.

11 BY MR. JACOBS:

12 Q. You can answer.

13 A. I believe so. Like I said, I don't know
14 every detail of the lawsuit.

15 Q. Right, but other than what we've discussed,
16 that encompasses the knowledge of what you have
17 regarding the allegations?

18 A. Yes.

19 MS. POLLY: Object to the form.

20 MR. JACOBS: All right. Nothing further.

21 MS. POLLY:

22 EXAMINATION BY MS. POLLY:

23 Q. I have just a few questions for you, Mr.
24 Knight.

25 A. Okay.

1 Q. When did you start working at Trousdale,
2 again?

3 A. Six years ago this month, November. It's
4 right at six years, so 2015, I believe.

5 Q. November of 2015?

6 A. Yes.

7 Q. Are you aware that there are policies that
8 govern the operation of the Trousdale Turner
9 Correctional Center?

10 A. I am.

11 Q. And if we put those policies on the ground
12 and stack them up, they come pretty close to the
13 ceiling, don't they?

14 A. It's huge.

15 Q. You are aware that there are training
16 materials and training procedures that are implemented
17 there at Trousdale, correct?

18 A. Yes.

19 Q. Those are robust, are they not?

20 A. They are.

21 Q. And then there are all kinds of things that
22 go on at Trousdale. There are security practices and
23 procedures, correct?

24 A. Yes, things that aren't policy, but are
25 procedures, are SOPs, standard operating, the way we do

1 things on a day to day.

2 Q. That's everything from perimeter checks, to
3 cell checks, to checking the inmates, correct?

4 A. Yes, ma'am.

5 Q. You have not discussed all of that today,
6 have you?

7 A. I have not.

8 Q. Probably not even possible to discuss in two
9 hours, is it?

10 A. No, I mean, there's a lot that we do day to
11 day.

12 Q. But you have knowledge of all of that and
13 would come to trial prepared to testify about that, if
14 asked?

15 A. Yes, ma'am.

16 MS. POLLY: Thank you. I don't have any
17 further questions.

18 MR. JACOBS: No follow-up.

19 FURTHER DEPONENT SAITH NOT.

20

21

22

23

24

25

1 CERTIFICATE

2 STATE OF TENNESSEE)
3) SS.
4 COUNTY OF DAVIDSON)

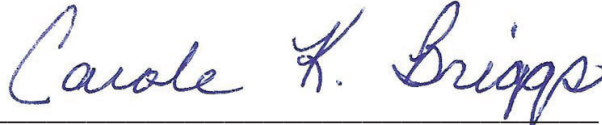
5 I, CAROLE K. BRIGGS, Licensed Court Reporter
6 within and for the State of Tennessee, do hereby certify
7 that the above deposition was reported by me and that
8 the foregoing pages of the transcript is a true and
9 accurate record to the best of my knowledge, skills, and
10 ability.

11 I further certify that I am not a relative,
12 counsel or attorney of either party nor employed by any
13 of the parties in this case or otherwise interested in
14 the event of this action.

15 IN WITNESS WHEREOF, I have hereunto affixed my
16 official hand on this 6th day of December 2021.

17

18

19 
20

21 CAROLE K. BRIGGS

22 Shorthand Reporter

23 Tennessee License No. 345

24

25

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